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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
VICTOR ROMERO GALVAN,  
  
Defendants.

CASE NO. 1:20-CR-00161-JLT-SKO  
  
STIPULATION AND ORDER REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT  
  
DATE: OCTOBER 30, 2024  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant VICTOR ROMERO GALVAN, by and through defendant's counsel of record, Danial Harralson, hereby stipulate as follows:

1. By previous order, this matter was set for status on October 30, 2024.
2. By this stipulation, parties now move to continue the status conference to March 5, 2025, and to exclude time between October 30, 2024, and March 5, 2025, under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes over 14,000 pages of Bates stamped discovery and numerous wiretap recordings. The majority of the discovery has been either produced directly to counsel and/or made available for inspection and copying. Supplemental discovery has also been produced.

1           b)     There was a change in counsel and defendant Galvan has new counsel as of July  
2     2024. Plea negotiations are ongoing.

3           c)     Counsel for defendant desires additional time to consult with his client, to review  
4     the current charges, to conduct investigation and research related to the charges, to review and  
5     copy discovery for this matter, and to discuss potential resolution with his client.

6           d)     Counsel for defendant believes that failure to grant the above-requested  
7     continuance would deny him the reasonable time necessary for effective preparation, taking into  
8     account the exercise of due diligence.

9           e)     Additionally, given the voluminous discovery and the fact that this case involved  
10    a wiretap investigation, it is so complex that it is unreasonable to expect adequate preparation for  
11    pretrial proceedings or for the trial itself prior to March 5, 2025.

12          f)     The parties will be prepared to set a trial date at the next status conference if a  
13    resolution has not been reached.

14          g)     Based on the above-stated findings, the ends of justice served by continuing the  
15    case as requested outweigh the interest of the public and the defendant in a trial within the  
16    original date prescribed by the Speedy Trial Act.

17          h)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
18    et seq., within which trial must commence, the time period of October 30, 2024 to March 5,  
19    2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
20    T4] and 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T2], because it results from a continuance  
21    granted by the Court at defendant's request on the basis of the Court's finding that the ends of  
22    justice served by taking such action outweigh the best interest of the public and the defendant in  
23    a speedy trial.

24          4.     Nothing in this stipulation and order shall preclude a finding that other provisions of the  
25    Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
26    must commence.

27                 IT IS SO STIPULATED.  
28

1 Dated: October 22, 2024

PHILLIP A. TALBERT  
United States Attorney

2  
3 /s/ ANTONIO J. PATACA  
4 ANTONIO J. PATACA  
Assistant United States Attorney

5  
6  
7 Dated: October 26, 2023

/s/ DANIEL HARRALSON  
DANIEL HARRALSON  
Counsel for Defendant  
VICTOR ROMERO GALVAN

8  
9  
10  
11 **ORDER**

12  
13 The parties shall be prepared to select a mutually agreeable trial date at the next status  
14 conference.

15 IT IS SO ORDERED.

16  
17 DATED: 10/22/2024

*Sheila K. Oberto*  
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THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE